

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY  
R.J. Hughes Justice Complex  
25 Market Street  
P.O. Box 112  
Trenton, NJ 08625

Attorney for Defendants, State of New Jersey, State of New Jersey Department of Children and Families, Division of Child Protection and Permanency, Bergen County Prosecutor's Office, Christine Norbut-Beyer and Joanna Holota

By: Marvin L. Freeman  
Deputy Attorney General  
(609) 376-2440  
marvin.freeman@law.njoag.gov

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
VICINAGE OF NEWARK

COURTNEY TAMAGNY AND  
JEANNE TAMAGNY,

Plaintiffs,

v.

DIVISION OF CHILD PROTECTION  
AND PERMANENCY, et al.,

Defendants.

Hon. Susan D. Wigenton, U.S.D.J.  
Hon. Cathy L. Waldor, U.S.M.J.

Docket No.2:25-cv-00732  
(SDW-CLW)

Electronically Filed

**NOTICE OF MOTION TO  
DISMISS THE AMENDED  
COMPLAINT PURSUANT TO  
Fed.R.Civ.P. 12(b)(1) and (6)**

**PLEASE TAKE NOTICE** that on July 7, 2025, or at such other time as it may please the Court, the undersigned Matthew J. Platkin, Attorney General of New Jersey, by Marvin L. Freeman, Deputy Attorney General, appearing on behalf of Defendants, State of New Jersey, State of New Jersey Department of Children and

Families, Division of Child Protection and Permanency, Bergen County Prosecutor's Office, Christine Norbut-Beyer and Joanna Holota, ("Defendants"), shall move for an Order to dismiss the amended complaint pursuant to F. R. Civ. P. 12((b) (1) and (6), for lack of subject matter jurisdiction and failure to state a claim upon which relief can be granted.

**PLEASE TAKE FURTHER NOTICE** that the Defendants will rely upon the Brief and Declaration of Counsel with attached exhibit, in support of this Motion.

Oral argument is not requested. A proposed form of Order is submitted herewith.

MATTHEW J. PLATKIN  
ATTORNEY GENERAL OF NEW JERSEY

By: s/ Marvin L. Freeman  
Marvin L. Freeman  
Deputy Attorney General

DATED: May 27, 2025